

**Federal Defenders
OF NEW YORK, INC.**

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*Southern District of New York
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May 26, 2022

BY ECF

Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Leonaldo Bueno Coplin
22 Cr. 144 (VM)**

Dear Judge Marrero:

I write, with the consent of Pretrial Services and the Government, to request that the Court modify Mr. Bueno-Coplin's bail conditions as follows:

1. Replace home detention with a curfew enforced by LM.
2. Permit travel to the District of New Jersey for purposes of work.

On December 8, 2021, Mr. Bueno-Coplin was released on bond with the following conditions: a \$75,000 unsecured personal recognizance bond signed by 3 financially responsible persons; Pretrial Services supervision as directed: home detention with GPS monitoring; travel limited to SDNY/ENY and ED PA (and points in between for purposes of travel; surrender all travel documents; and continue or seek employment.

Since his release, Mr. Bueno-Coplin has meticulously abided by his conditions of release and continues to demonstrate that he is not a risk of flight or a danger to the community. He is employed full time as a house painter. His current employment frequently has job opportunities in New Jersey, but Mr. Bueno-Coplin's travel restriction prevents him from accepting them.

Therefore, considering Mr. Bueno-Coplin's perfect compliance with his bail conditions and in order for him to expand his employment opportunities without need of the Court's involvement, I respectfully request that the Court modify his bail conditions as requested.

Respectfully submitted,

/s/ Amy Gallicchio

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Cc

Request GRANTED.

The conditions of Mr. Bueno Coplin's bail shall be modified to remove the condition of home detention. That condition shall be replaced with a curfew, to be determined and enforced by Pretrial Services. Mr. Bueno Coplin's bail conditions shall also be modified to allow travel to the District of New Jersey.

SO ORDERED.

5/27/2022

DATE


VICTOR MARRERO, U.S.D.J.